

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 1:22-cv-24023-SCOLA/GOODMAN**

KENNETH C. GRIFFIN,

Plaintiff,

v.

INTERNAL REVENUE SERVICE and U.S.
DEPARTMENT OF THE TREASURY,

Defendants.

***TIME SENSITIVE UNOPPOSED MOTION TO PARTIALLY SEAL
EXHIBIT 1 TO MOTION TO COMPEL***

Pursuant to Southern District of Florida Local Rule 5.4 and this Court's stipulated Protective Order, ECF 86, Plaintiff Kenneth C. Griffin ("Mr. Griffin") respectfully moves this Court to seal pages 333 to 396 of ECF 111-2, which is Exhibit 1 to Plaintiff's Motion to Compel Pursuant to the Court's Administrative Order (ECF 111), and states as follows:

On April 19, 2024, counsel for Defendants Internal Revenue Service and U.S. Department of Treasury (the "Government") informed counsel for Mr. Griffin that the Government "agree[s] you can file the transcript [of Mr. Charles Edward Littlejohn's deposition] on the public docket as long as the portions that are designated confidential are redacted." Accordingly, when Mr. Griffin filed his Motion to Compel on April 24, he included the redacted transcript of Mr. Littlejohn's deposition. The Government agrees that the transcript is "redacted consistent with the confidentiality designations." However, the Government now asks that pages 333 to 396 of the transcript (which contains the word index for the transcript) also be sealed, and Mr. Griffin agrees that those pages should be sealed pending the Court's adjudication of the parties' confidentiality

dispute. Sealing pages 333 to 396 of the transcript will not cause any additional testimony to be withheld from the public, and good cause exists to seal those pages.

WHEREFORE, Mr. Griffin respectfully requests that the Court grant this motion. A proposed order granting the relief requested herein is attached as Exhibit A.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Undersigned counsel conferred with counsel for Defendants by email on April 25, 2024, and consents to Defendants' request to have pages 333 to 396 of ECF 111-2 temporarily sealed from the public view.

Dated: April 25, 2024

Respectfully submitted,

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Counsel to Plaintiff Kenneth C. Griffin

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 25th day of April, 2024, I caused a copy of the foregoing document to be filed with the Clerk of Court using the CM/ECF electronic filing system, which will send notification to all counsel of record.

By: /s/ Jason D. Sternberg
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